

FILED

AUG 21 2023

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANIEL LAWRENCE CHARBA,

Defendant.

Case No. **23 CR 26 4 GKF**

INDICTMENT

[COUNT ONE: 26 U.S.C.

§§ 5861(f), 5871, and 5822 –

Unlawfully Making a Destructive
Device;

COUNT TWO: 26 U.S.C.

§§ 5861(d) and 5871 – Possession of
an Unregistered Destructive Device;

Forfeiture Allegation: 26 U.S.C.

§ 5872 and 28 U.S.C. § 2461 –

Unlicensed Firearms Forfeiture]

THE GRAND JURY CHARGES:

COUNT ONE

[26 U.S.C. §§ 5861(f), 5871, and 5822]

Between on or about April 12, 2022 and April 12, 2023, in the Northern District of Oklahoma, the defendant, **DANIEL LAWRENCE CHARBA**, knowingly and unlawfully made firearms, that is, destructive devices, described as fourteen improvised explosive devices.

All in violation of Title 26, United States Code, Sections 5861(f), 5871, and 5822.

COUNT TWO
[26 U.S.C. §§ 5861(d) and 5871]

On or about April 12, 2023, in the Northern District of Oklahoma, the defendant, **DANIEL LAWRENCE CHARBA**, possessed firearms which were not registered to him in the National Firearms Registration and Transfer Record, that is, fourteen destructive devices.

All in violation of Title 26, United States Code, Sections 5861(d) and 5871.

FORFEITURE ALLEGATION
[26 U.S.C. § 5872 and 28 U.S.C. § 2461]

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 26, United States Code, Section 5872 and Title 28, United States Code, Section 246.

Upon conviction of the offenses alleged in this Indictment, as a part of his sentence, the defendant, **DANIEL LAWRENCE CHARBA**, shall forfeit to the United States any firearm and ammunition involved in or used in the knowing commission of such offenses.

All pursuant to Title 26, United States Code, Section 5872 and Title 28, United States Code, Section 2461.

CLINTON J. JOHNSON
United States Attorney

A TRUE BILL



NATHAN E. MICHEL
Assistant United States Attorney

/s/ Grand Jury Foreperson
Grand Jury Foreperson